

1 Stephen G. Larson (SBN 145225)  
*slarson@larsonllp.com*

2 Hilary Potashner (SBN 167060)  
*hpotashner@larsonllp.com*

3 Jonathan Gershon (SBN 306979)  
*jgershon@larsonllp.com*

4 **LARSON LLP**  
555 South Flower Street, 30<sup>th</sup> Floor  
5 Los Angeles, California 90071  
6 Telephone: (213) 436-4888  
Facsimile: (213) 623-2000

7 Attorneys for Defendant  
JASON EDWARD THOMAS CARDIFF

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9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JASON EDWARD THOMAS  
15 CARDIFF,

16 Defendant.

Case No. 5:23-CR-00021-JGB

**UNOPPOSED *EX PARTE*  
APPLICATION FOR LEAVE TO  
FILE MOTION TO DISMISS  
INDICTMENT WITH PREJUDICE,  
DECLARATION OF STEPHEN G.  
LARSON IN SUPPORT OF  
MOTION TO DISMISS  
INDICTMENT WITH PREJUDICE  
AND EXHIBITS *UNDER SEAL*;  
DECLARATION OF STEPHEN G.  
LARSON**

*[Filed concurrently with [Proposed]  
Order]*

1           **EX PARTE APPLICATION FOR LEAVE TO FILE UNDER SEAL**

2   **I.     CONTACT INFORMATION FOR OPPOSING COUNSEL PURSUANT**  
3       **TO C.D. CAL LOCAL RULE 7-19**

4 Valerie Makarewicz  
5 Assistant United States Attorney  
6 1100 U.S. Courthouse  
7 312 North Spring Street  
8 Los Angeles, California 90012  
9 Tel: (213) 894-0756  
10 E-mail:valerie.makarewicz@usdoj.gov

11 Manu J. Sebastian  
12 Consumer Protection Branch  
13 U.S. Department of Justice  
14 450 5th St NW Ste 6400 S  
15 Washington, DC, 20001-2739  
16 Tel: (202) 514-0515  
17 Email: manu.j.sebastian@usdoj.gov

18           **II.   APPLICATION**

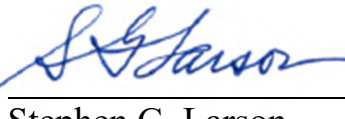
19           The Defense hereby applies for an order authorizing the filing of an  
20 unredacted versions of his Motion to Dismiss Indictment with Prejudice, the  
21 Declaration of Stephen G. Larson in support of Motion to Dismiss Indictment with  
22 Prejudice, and Exhibits *under seal*.

23           The parties in this matters stipulated to a protective order. (ECF No. 37.)  
24 Section 5(k) of the protective order provides “[i]n the event that a party needs to file  
25 Confidential Information with the Court or divulge the contents of Confidential  
26 Information in court filings, the filing should be made under seal.” Both the Motion  
27 to Dismiss Indictment with Prejudice (“Motion”) and Declaration of Stephen G.  
28 Larson in support of Motion to Dismiss Indictment with Prejudice; Exhibits  
29 (“Exhibits”) contain information that has been identified as Confidential  
30 Information by the government. Accordingly, in order to abide by the stipulated  
31 terms of the protective order in this matter, the Defense requests this sealing order.

1 On April 1, 2024, the government advised by email that it does not oppose  
2 this request.

3  
4 Dated: April 8, 2024

LARSON LLP

5  
6 By: 

7  
8 Stephen G. Larson  
9 Hilary Potashner  
Jonathan Gershon

10 Attorneys for Defendant  
11 JASON EDWARD THOMAS CARDIFF  
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**DECLARATION OF STEPHEN G. LARSON**

I, Stephen G. Larson, hereby declare and state as follows:

1. I am a partner at Larson LLP, attorneys of record for Defendant Jason Cardiff. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify to the matters stated herein.

2. Pursuant to L.R. 7-19, I submit this declaration in support of Jason Cardiff's *Ex Parte* Application for Leave to File Cardiff's Motion to Dismiss Indictment with Prejudice and Declaration of Stephen G. Larson in Support of Motion to Dismiss Indictment with Prejudice; Exhibits *under seal*.

3. On April 1, 2024, the government sent an email to defense counsel informing that it does not oppose this sealing request.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on this 8th day of April, 2024, at Los Angeles, California.



Stephen G. Larson

**PROOF OF SERVICE**

***United States of America v. Cardiff***  
**Case No. 5:23-CR-00021-JGB**

**STATE OF , COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of . My business address is 555 South Flower Street, 30th Floor, Los Angeles, CA 90071.

On April 8, 2024, I served true copies of the following document(s):

**UNOPPOSED *EX PARTE* APPLICATION FOR LEAVE TO FILE  
MOTION TO DISMISS INDICTMENT WITH PREJUDICE,  
DECLARATION OF STEPHEN G. LARSON IN SUPPORT OF MOTION TO  
DISMISS INDICTMENT WITH PREJUDICE AND EXHIBITS *UNDER  
SEAL*; DECLARATION OF STEPHEN G. LARSON**

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address hpark@larsonllp.com to the persons at the e-mail addresses listed in the attached Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 8, 2024, at Los Angeles, California.



Haewon Park

**SERVICE LIST**

***United States of America v. Cardiff***  
**Case No. 5:23-CR-00021-JGB**

E. Martin Estrada Attorneys for Plaintiff  
United States Attorney UNITED STATES OF AMERICA  
Mack E. Jenkins  
Assistant United States Attorney  
Chief, Criminal Division  
Ranee A. Katzenstein  
Assistant United States Attorney  
Chief, Criminal Division  
Valerie Makarewicz  
Assistant United States Attorney  
Major Frauds Section  
1100 United States Courthouse  
312 North Spring Street  
Los Angeles, CA 90012  
Telephone: (213) 894-0756  
Facsimile: (213) 894-6269  
E-mail: [Valerie.Makarewicz@usdoj.gov](mailto:Valerie.Makarewicz@usdoj.gov)

Amanda Liskamm Attorneys for Plaintiff  
Director, Consumer Protection Branch UNITED STATES OF AMERICA  
Manu J. Sebastian  
Brianna M. Gardner  
Trial Attorneys  
Consumer Protection Branch  
U.S. Department of Justice  
450 Fifth Street NW, Suite 6400  
Washington, DC 20001  
Telephone: (202) 514-0515  
Facsimile: (202) 514-8742  
E-mail: [Manu.J.Sebastian@usdoj.gov](mailto:Manu.J.Sebastian@usdoj.gov)  
[Brianna.M.Gardner@usdoj.gov](mailto:Brianna.M.Gardner@usdoj.gov)